

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANNE SOKOLOFF, et al

v.

FEDEX CORPORATION, et al

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JURY TRIAL DEMANDED

No. 2:17-cv-00172-MAK

**DEFENDANTS FEDEX CORPORATION AND MATTHEW J. LIEBLANG'S
MOTION TO COMPEL PLAINTIFFS' DISCOVERY RESPONSES**

Defendants, FedEx Corporation and Matthew J. Lieblang, by and through their attorneys hereby file this motion asking this Honorable Court compel plaintiffs to serve responses to Interrogatories directed to plaintiff Harvey Sokoloff and Request for Production of Documents directed to both plaintiffs and in support thereof aver as follows:

1. Defendants served Interrogatories and Request for Production of Documents to plaintiffs on January 24, 2017.

2. On March 30, 2017 and April 12, 2017, defendants wrote to plaintiffs requesting responses to the discovery requests within ten days as such responses were overdue.

3. To date, defendants have received only responses to Interrogatories from Anne Sokoloff, but not from Harvey Sokoloff or to their Request for Production of Documents.

4. Defendants require these responses in order to prepare their defense.

WHEREFORE, defendants, FedEx Corporation and Matthew J. Lieblang, respectfully request this Honorable Court grant its Motion to Compel and enter the attached order.

**WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY, LLP**

Dated: April 26, 2017

By: /s/ James A. Wescoe

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**ATTORNEY CERTIFICATION OF GOOD FAITH PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE RULE 37(a)(1)**

The undersigned counsel for the moving party hereby certifies and attests that:

- On March 30, 2017, counsel for defendants sent a letter to plaintiffs' counsel advising that plaintiffs' discovery responses were overdue.
- After receiving Mrs. Sokoloff's responses to Interrogatories, counsel for defendants sent a second letter, on April 12, 2017, to plaintiffs' counsel advising that Interrogatory responses from Mr. Sokoloff and to the Request for Production of Documents were overdue.
- To date, defendants have not received responses to Interrogatories directed to Mr. Sokoloff or to Request for Production of Documents directed to both plaintiffs.

**WEBER GALLAGHER SIMPSON
STAPLETON FIRES & NEWBY, LLP**

By: /s/ James A. Wescoe
James A. Wescoe, Esquire
Katherine A. Tenzinger, Esquire
*Attorneys for Defendants,
FedEx Freight, Inc. and Matthew Lieblang*